September 13, 2000 Certified Mail: Z 029 877 153

Robert Marshall
Director – Environmental Affairs
Cerestar USA, Inc.
1100 Indianapolis Blvd.
Hammond, IN 46320-1094

Re: Minor Source Modification No: 089-12593-00203

Dear Mr. Marshall:

Cerestar USA applied for a Part 70 operating permit on December 13, 1996 for a corn refining facility. An application to modify the source was received on June 5, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

New Emissions Units to be installed (6):

(1) Channel 2 Filter/Receiver, identified as 93-32, with a maximum capacity of fifteen (15) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-32. Emissions shall be limited to 0.005 gr/dscf (0.10 lbs/hr) per the manufacturer's specifications submitted in your application and 326 IAC 6-1-2 (h).

(2) Channel 3 Filter/Receiver, identified as 93-33, with a maximum capacity of twenty-five (25) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-33. Emissions shall be limited to 0.005 gr/dscf (0.10 lbs/hr) per the manufacturer's specifications submitted in your application and 326 IAC 6-1-2 (h).

(3) Channel 2/3 Packing Dust Collector, identified as 93-36, with a maximum capacity of forty (40) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-36. Emissions shall be limited to 0.005 gr/dscf (0.51 lbs/hr) per the manufacturer's specifications submitted in your application and 326 IAC 6-1-2 (h).

(4) Channel 4 Filter/Receiver, identified as 93-34, with a maximum capacity of fifteen (15) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-34. Emissions shall be limited to 0.005 gr/dscf (0.10 lbs/hr) per the manufacturer's specifications submitted in your application and 326 IAC 6-1-2 (h).

(5) Dextrin Filter/Receiver, identified as 93-35, with a maximum capacity of four and one half (4.5) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-35. Emissions shall be limited to 0.005 gr/dscf (0.10 lbs/hr) per the manufacturer's specifications submitted in your application and 326 IAC 6-1-2 (h).

(6) Channel 1/4 (Dextrin) Packing Dust Collector, identified as 93-37, with a maximum capacity of forty (40) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-37. Emissions shall be limited to 0.005 gr/dscf (0.51 lbs/hr) per the manufacturer's specifications submitted in your application and 326 IAC 6-1-2 (h).

These Emission Units shall be permanently removed as the new units are brought on-line (5):

(1-3) Cornstarch Conveying #46 and #47 and Dextrin Conveying #48, identified as 93-01 thru 93-03, with a maximum capacity of ninety (90) tons/hr, using a bag filter dust collector as control, and exhausting to stacks 93-01 thru 93-03. Allowable emissions per 326 IAC 6-1-10.1 (d) were 1.62 lbs/hr.

(4-5) Starch Packing Systems #43 and #44, identified as 93-06 and 93-07, with a maximum capacity of sixty (60) tons/hr, using a bag filter dust collector as control, and exhausting to stacks 93-06 and 93-07. Allowable emissions per 326 IAC 6-1-10.1 (d) were 0.24 lbs/hr.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5 (l)(3). The source may begin operation upon issuance of the minor source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (219) 853-6306 and ask for Ronald Holder or Debra Malone.

Sincerely,

Ronald L. Novak, Director
Hammond Department of Environmental Management
Air Pollution Control Division

Attachments

RH

cc: U.S. EPA, Region V - Cheryl Newton
Permits Administration - Mindy Hahn

PART 70 MINOR SOURCE MODIFICATION

Indiana Department of Environmental Management
Office of Air Management

and

Hammond Department of Environmental Management
Air Pollution Control Division

Cerestar USA, Inc.
1100 Indianapolis Boulevard
Hammond, Indiana 46320-1094

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 089-12593-00203	
Issued by:	Issuance Date: September 13, 2000
Ronald L. Novak, Director Hammond Department of Environmental Management	

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SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Hammond Department of Environmental Management (HDEM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a Wet Corn Milling Facility.

Responsible Official:	Robert H. Marshall
Source Address:	1100 Indianapolis Boulevard, Hammond, Indiana 46320-1094
Mailing Address:	1100 Indianapolis Boulevard, Hammond, Indiana 46320-1094
Phone Number:	(219) 473-2510
SIC Code:	2046 – Wet Corn Milling
County Location:	Lake
County Status:	Nonattainment for PM_{10}, Ozone, and SO_2 Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary **s**ource is approved to construct and operate the following six (6) emission units and pollution control devices:

(1) Channel 2 Filter/Receiver, identified as 93-32, with a maximum capacity of fifteen (15) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-32.

(2) Channel 3 Filter/Receiver, identified as 93-33, with a maximum capacity of twenty-five (25) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-33.

(3) Channel 2/3 Packing Dust Collector, identified as 93-36, with a maximum capacity of forty (40) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-36.

(4) Channel 4 Filter/Receiver, identified as 93-34, with a maximum capacity of fifteen (15) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-34.

(5) Dextrin Filter/Receiver, identified as 93-35, with a maximum capacity of four and one half (4.5) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-35.

(6) Channel 1/4 (Dextrin) Packing Dust Collector, identified as 93-37, with a maximum capacity of forty (40) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-37.

The following five (5) emission units will be replaced by the above new units and shall be removed as the new units are brought on-line.

(1) Cornstarch Conveying #46, identified as 93-01, with a maximum capacity of thirty (30) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-01.

(2) Cornstarch Conveying #47, identified as 93-02, with a maximum capacity of thirty (30) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-02.

(3) Dextrin Conveying #48, identified as 93-03, with a maximum capacity of thirty (30) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-03.

(4) Starch Packing System #43, identified as 93-06, with a maximum capacity of thirty (30) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-06.

(5) Starch Packing System #44, identified as 93-07, with a maximum capacity of thirty (30) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-07.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM and HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM
Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

HDEM
Telephone Number: 219-853-6306
Facsimile Number: 219-853-6343

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and the:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM and HDEM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the

emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and the:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(2) PMP's shall be submitted to IDEM, OAM or HDEM upon request and shall be subject to review and approval by IDEM, OAM or HDEM. IDEM, OAM or HDEM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

(b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and the:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this approval:

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Testing Requirements [326 IAC 2-7-6(1)]

C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and the:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM and HDEM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM or HDEM if the source submits to IDEM, OAM or HDEM a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and the:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.8 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.9 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this approval;

(3) The Compliance Monitoring Requirements in Section D of this approval;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM or HDEM upon request and shall be subject to review and approval by IDEM, OAM or HDEM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.11 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM or HDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM or HDEM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this approval;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and the:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

(b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and HDEM on or before the date it is due.

(c) Unless otherwise specified in this approval, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

93 Warehouse and Packaging, consisting of the following equipment:

(a) Channel 2 Filter/Receiver, identified as 93-32, with a maximum capacity of fifteen (15) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-32.

(b) Channel 3 Filter/Receiver, identified as 93-33, with a maximum capacity of twenty-five (25) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-33.

(c) Channel 2/3 Packing Dust Collector, identified as 93-36, with a maximum capacity of forty (40) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-36.

(d) Channel 4 Filter/Receiver, identified as 93-34, with a maximum capacity of fifteen (15) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-34.

(e) Dextrin Filter/Receiver, identified as 93-35, with a maximum capacity of four and one half (4.5) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-35.

(f) Channel 1/4 (Dextrin) Packing Dust Collector, identified as 93-37, with a maximum capacity of forty (40) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-37.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter less than ten (10) microns in diameter (PM10) [326 IAC 6-1-2(h)]

Pursuant to 326 IAC 6-1-2(h)(Nonattainment Area Particulate Limitations), emissions of particulate matter less than ten (10) microns in diameter (PM10) from the 93 Warehouse and Packaging emission units shall not exceed the following limitations:

Emission Unit Description	ID	PM10 Emission Limit (gr/dscf)	PM10 Emission Limit (lbs/hr)
Channel 2 Filter/Receiver	93-32	0.005	0.10
Channel 3 Filter/Receiver	93-33	0.005	0.10
Channel 2/3 Packing Dust Collector	93-36	0.005	0.51
Channel 4 Filter/Receiver	93-34	0.005	0.10
Dextrin Filter/Receiver	93-35	0.005	0.10
Channel 1/4 (Dextrin) Packing Dust Collector	93-37	0.005	0.51

D.1.2 Preventive Maintenance Plan (PMP) [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C.2 - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.1.3 Continual Compliance Plan (CCP) [326 IAC 2-7-5(13)][326 6-1-10.1(l)]

The Continuous Compliance Plan, required for this source by 326 IAC 6-1-10.1 (l), shall include any emission units or control equipment in this D section subject to 326 IAC 6-1-10.1(d), (Lake County PM10 requirements).

Compliance Determination Requirements

D.1.4 Particulate Matter (PM) and Particulate Matter less than ten (10) microns in diameter (PM10)

In order to meet the particulate emissions limitations in Condition D.1.1, the bag filters dust collectors for PM and PM10 control shall be in operation and control emissions from the 93 Warehouse and Packaging Systems 93-32 through 93-37 in Section D.1 at all times that the systems are in operation.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326IAC 2-1.1-11]

IDEM may require compliance testing at any specific time when necessary to determine if the source is in compliance. If testing is required by IDEM, compliance with the limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C – Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations

(a) Daily visible emission notations of the receiver and packing stack exhausts 93-32 through 93-37 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across each bag filter dust collector used in conjunction with the 93 Warehouse and Packing Systems at least once daily when the receivers and packing systems are in operation and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each bag filter dust collector shall be maintained within a range that zero visible emissions have been noted or a range established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above-mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C.8 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and HDEM, and shall be calibrated at least once every six (6) months.

D.1.8 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the 93 Warehouse and Packing Systems that vent to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the 93 Warehouse and Packing stack exhausts.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name:	Cerestar USA, Inc.
Source Address:	1100 Indianapolis Blvd., Hammond, IN 46320-1094
Mailing Address:	1100 Indianapolis Blvd., Hammond, IN 46320-1094
Source Modification No.:	089-12593-00203

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

_ Test Result (specify)

_ Report (specify)

_ Notification (specify)

_ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Hammond Department of Environmental Management
Air Pollution Control Division

and

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70
Minor Source Modification

Source Background and Description

Source Name:	Cerestar USA, Inc.
Source Location:	1100 Indianapolis Blvd., Hammond, 46320-1094
County:	Lake
SIC Code:	2046 – Wet Corn Milling
Operation Permit No.:	T089-7994-00203
Operation Permit Issuance Date:	**not issued yet**
Minor Source Modification No.:	089-12593-00203
Permit Reviewer:	Ronald Holder

The Office of Air Management (OAM) has reviewed a modification application from Cerestar USA relating to the installation of the following emission units and pollution control devices to replace the following outdated and similar existing emissions units and pollution control devices. The existing units will be removed as the new units are brought on-line. These units are the receiving and packing points for pneumatically conveyed cornstarch products.

New Emission Units (6):

(1) Channel 2 Filter/Receiver, identified as 93-32, with a maximum capacity of fifteen (15) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-32.

(2) Channel 3 Filter/Receiver, identified as 93-33, with a maximum capacity of twenty-five (25) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-33.

(3) Channel 2/3 Packing Dust Collector, identified as 93-36, with a maximum capacity of forty (40) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-36.

(4) Channel 4 Filter/Receiver, identified as 93-34, with a maximum capacity of fifteen (15) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-34.

(5) Dextrin Filter/Receiver, identified as 93-35, with a maximum capacity of four and one half (4.5) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-35.

(6) Channel 1/4 (Dextrin) Packing Dust Collector, identified as 93-37, with a maximum capacity of forty (40) tons/hr, using a bag filter dust collector as control, and exhausting to stack 93-37.

Replaced Emission Units (5): These units will be removed as the new units are brought on-line.

(1-3) Cornstarch Conveying #46 and #47 and Dextrin Conveying #48, identified as 93-01 thru 93-03, with a maximum capacity of ninety (90) tons/hr, using a bag filter dust collector as control, and exhausting to stacks 93-01 thru 93-03.

(4-5) Starch Packing Systems #43 and #44, identified as 93-06 and 93-07, with a maximum capacity of sixty (60) tons/hr, using a bag filter dust collector as control, and exhausting to stacks 93-06 and 93-07.

History

On June 5, 2000, Cerestar USA submitted an application to the HDEM requesting to streamline and update their packaging systems in Building 93 at their existing plant. Cerestar, USA (American Maize-Products Company) was purchased in 1996 by Eridania Beghin-Say, a European Company. They are currently undergoing extensive modernization to meet stricter product quality control as demanded by the marketplace. Modifications "channelization projects" which include the replacement and upgrading of old, outdated, and inefficient equipment, also include new and better air pollution controls usually resulting in emissions reductions.

Although actual emissions to the atmosphere have probably been reduced due to the new equipment, this modification has a mathematical increase in potential emissions and therefore, warrants a minor source modification per 326 2-7-10.5 (d)(4)(A).

Cerestar submitted their Part 70 application on December 31, 1996. The Title V permit has not been issued. Their application will be revised to include the information from this minor source modification "Starch Warehouse Channelization Project".

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flowrate (acfm)	Temp (^{0}F)
93-32	Channel 2 Filter/Receiver	77.5	1	2400	90
93-33	Channel 3 Filter/Receiver	77.5	1	2400	90
93-36	Channel 2/3 Packaging Dust Collector	10.0	2	12000	70
93-34	Channel 4 Filter/Receiver	77.5	1	2400	90
93-35	Dextrin Filter/Receiver	77.5	1	2400	90
93-37	Channel 1/4 Dextrin Packaging Dust Collector	10.0	2	12000	70

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 5, 2000. Additional information was received on July 27, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (five (5) pages).

Potential To Emit of Modification

This table shows the potential to emit (PTE) of the modification. This is the potential before controls of the new equipment.

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	23.27
PM-10	6.05
SO_2	0
VOC	0
CO	0
NO_x	0

HAP's	Potential To Emit (tons/year)
none	0
TOTAL	0

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5 (d)(4)(A), modifications that would have the potential to emit…less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either particulate matter (PM) or particulate matter less than ten (10) microns (PM_{10}).

County Attainment Status

This source is located in Lake County.

40 CFR 81.315 – (Indiana) – 7/1/99

Pollutant	Status
PM-10	moderate non-attainment
SO_2	primary non-attainment
NO_2	attainment*****
Ozone	severe non-attainment
CO	attainment
Lead	attainment

*****Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe non-attainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Lake County has been classified as moderate non-attainment for particulates less than ten (10) microns in diameter (PM_{10}). Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	303
PM-10	303
SO_2	339
VOC	407
CO	138
NOx	486

This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

These emissions are based upon the 1999 Emissions Statement submitted by Cerestar USA.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Channel 2 Filter Receiver	N/A	0.43	0	0	0	0	0
Channel 3 Filter Receiver	N/A	0.43	0	0	0	0	0
Channel 2/3 Packaging Dust Collector	N/A	2.25	0	0	0	0	0
Channel 4 Filter Receiver	N/A	0.43	0	0	0	0	0
Dextrin Filter Receiver	N/A	0.43	0	0	0	0	0
Channel 1/4 (Dextrin) Packaging DC	N/A	2.25	0	0	0	0	0
Total		6.22					

This modification to an existing major stationary source is not major because the net emissions increase per 326 IAC 2-3-1 (t) is less than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

PM_{10} emissions are based on Cerestar USA's acceptance of the manufacturer's specifications of 0.005 gr/dscf as a limitation and as actual annual emissions based on 8760 hours of operation. Cerestar also accepts in their application that the entire loading to the atmosphere is PM_{10}. (see Appendix A calculations (five (5) pages).

Lake County is moderate non-attainment for PM_{10}. The above emissions limitations are determined from the applicability of rule 326 IAC 6-1-2 (h) which states that "based on modeling analysis available to the commissioner, where it is determined that the above limitations (0.03 gr/dscf from 6-1-2 (a)) are not adequate to achieve and maintain the ambient particulate air quality standards established by 326 IAC 1-3, those limitations set forth in this section may be changed for facilities having significant impact on air quality and located in areas where the ambient particulate standard is either not attained or will not be maintained without emission limitations in addition to those set forth in this section".

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source submitted their Part 70 (T-089-7994-00203) application on December 13, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

This status is based on all the air approvals issued to the source. This status has been verified by the HDEM.

Federal Rule Applicability

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification. 40 CFR 60, Subpart DD, Standards of Performance for Grain Elevators, does not apply to this source or these facilities because this "wet corn mill" does not have a permanent grain storage capacity of one (1) million bushels and corn starch movement facilities such as pneumatic conveying and packing are not affected facilities according to the definition in 40 CFR 60.300.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons/yr of VOC in Lake County. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

Cerestar will be required to update their emission statement to incorporate these changes.

326 IAC 6-1-10.1 (d) (Lake County PM10 Emission Requirements)

A PM_{10} SIP revision to 326 IAC 6-1-10.1 (d) requested by Cerestar has been approved. The approval is scheduled for finalization in September, 2000. They made a request to replace their limitations of pounds per ton (lbs/ton) with limitations in grains per dry standard cubic feet (gr/dscf) which is the guarantee they receive from the provider of their control equipment. In almost every case the new limitation was more stringent.

The emission units replaced in this review were among the units with PM_{10} SIP limits. The new units will have limitations based on the above more stringent gr/dscf as submitted in the application and guaranteed by manufacturer's specifications. These limitations will be enforced based on the following rule:

326 IAC 6-1-2 (h) (Particulate emission limitations)

Because of the Company's need to keep certain information such as maximum design rates confidential, they have accepted their provider's guarantees of 0.005 and 0.01 gr/dscf as the maximum emissions and maximum allowable emissions after control for most of their new and existing equipment. This limitation is within the standards set by any State or Local regulations governing particulates, PM_{10} or otherwise.

Therefore, each of the new filter receiver and packaging emission points in this review will be limited to 0.005 gr/dscf (0.10 or 0.51 lbs/hr depending on flow rate) per 326 IAC 6-1-2 (h) which states that "based on modeling analyses available to the commissioner, where it is determined that the above limitations (0.03 gr/dscf) are not adequate to achieve and maintain the ambient particulate air quality standards established by 326 IAC 1-3, those limitations set forth in this section may be changed for: (1) facilities having a significant impact on air quality and located in areas where the ambient particulate standard is either not attained or will not be maintained without emission limitations in addition to those set forth in this section."

Based on the calculations, the potential emissions after controls will meet or exceed the above limitations. The filter receiver and packaging systems will comply with this limitation, provided the control equipment is properly maintained and operating at all times when the process is in operation. These conditions (for dust control equipment) are standard language and will be incorporated in the minor source modification and the forthcoming comprehensive Title V Permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. The filter receiver and packaging dust collectors will have applicable compliance monitoring conditions that copy the elements of their Continuous Compliance Plan (CCP) as required in 326 6-1-10.1 (q) and as specified below:

(a) Daily visible emissions notations of the exhaust points for each unit shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the filter bag dust collectors controlling the filter receivers and packaging systems, at least once daily when the systems are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collectors shall be maintained within their normal range. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the control devices for these units must be in operation and proper working order at all times when the systems are in operation to demonstrate continuous compliance with their PM_{10} limits.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

None of these listed air toxics will be emitted from this proposed modification.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 089-12593-00203.

ALABAMA POWER LAW (CDS)/EIS CALCULATIONS

Appendix A

Starch Warehouse Channelization Project
New Emissions Units (6)

Cerestar USA, Inc.
1100 Indianapolis Blvd.
Hammond, Indiana 46320-1094

PLANT ID NO: 089-00203
INSP DATE: 12/21/99
CALC DATE: 7/27/00

CALCULATIONS BY: Ronald Holder

YEAR OF DATA: **review**

NO. OF POINTS: 6

NOTES
EF: EMISSION FACTOR
CE: CONTROL EFFICIENCY
MDR: MAXIMUM DESIGN RATE
MDC: MAXIMUM DESIGN CAPACITY
Ts: STACK DISCHARGE TEMPERATURE
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

****

93-32 **Channel 2 Filter Receiver**

MDR (T/hr): 15
YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1': 77.5')
FLOWRATE (ACFM): 2400
Ts(°F): 90

CNTRL DEV: Bag Filter Dust Collector

PERMITTED OPERATING HRS: **8760** hr/yr

Starch Filtering - SCC # 3-02-014-06
AP-42 Factors

			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROL				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0.05	0.99	0.750	18.000	**3.285**	0.008	**0.033**	0.0004	0	0
PM10	0.0125	0.99	0.188	4.500	**0.821**	0.002	**0.008**	0.0001	0.10	0.43
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

Emission factors obtained from the AP-42, Section 9.9.1 Grain Elevators and Processes (Storage Bin Loading).
(PM) EF = 0.020 lb/ton * 2.5 = 0.05 lb/ton (PM10) EF = 0.005 lb/ton * 2.5 = 0.0125 lb/ton
Emission Factor is multiplied by the Dustiness Ratio (DR), DR for corn = 2.5

0.005 gr/acfm
Manufacturer's specifications
326 IAC 6-1-2 (h)

****

93-33 **Channel 3 Filter Receiver**

MDR (T/hr): 25
YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1': 77.5')
FLOWRATE (ACFM): 2400
Ts(°F): 90

CNTRL DEV: Bag Filter Dust Collector

PERMITTED OPERATING HRS: **8760** hr/yr

Starch Filtering - SCC # 3-02-014-06
AP-42 Factors

			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROL				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0.05	0.99	1.250	30.000	**5.475**	0.013	**0.055**	0.0006	0	0
PM10	0.0125	0.99	0.313	7.500	**1.369**	0.003	**0.014**	0.0002	0.10	0.43
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

0.005 gr/acfm
Manufacturer's specifications

93-36 **Channel 2/3 Packaging Dust Collector**

MDR (T/hr): 40 | YEARLY PROD (T/yr): N/A | STACK ID (DIAM:HEIGHT): (2': 10') | FLOWRATE (ACFM): 12000 | Ts(°F): 70

CNTRL DEV: Bag Filter Dust Collector

PERMITTED OPERATING HRS: **8760** hr/yr

Starch Bulk Loadout - SCC # 3-02-014-08

AP-42 Factors

			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROL				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0.0275	0.99	1.100	26.400	**4.818**	0.011	**0.048**	0.0001	0	0
PM10	0.0075	0.99	0.300	7.200	**1.314**	0.003	**0.013**	0.0000	0.51	2.25
SOx	0	0	0	0	**0**	0	0	N/A	0	0
NOx	0	0	0	0	**0**	0	0	N/A	0	0
VOC	0	0	0	0	**0**	0	0	N/A	0	0
CO	0	0	0	0	**0**	0	0	N/A	0	0
LEAD	0	0	0	0	**0**	0	0	N/A	0	0

Emission factors obtained from the AP-42, Section 9.9.1 Grain Elevators and Processes (Product Loadout).

(PM) EF = 0.011 lb/ton * 2.5 = 0.0275 lb/ton (PM10) EF = 0.003 lb/ton * 2.5 = 0.0075 lb/ton

Emission Factor is multiplied by the Dustiness Ratio (DR), DR for corn = 2.5

0.005 gr/acfm

Manufacturer's specifications

326 IAC 6-1-2 (h)

93-34 **Channel 4 Filter Receiver**

MDR (T/hr): 15 | YEARLY PROD (T/yr): N/A | STACK ID (DIAM:HEIGHT): (1': 77.5') | FLOWRATE (ACFM): 2400 | Ts(°F): 90

CNTRL DEV: Bag Filter Dust Collector

PERMITTED OPERATING HRS: **8760** hr/yr

Starch Filtering - SCC # 3-02-014-06

AP-42 Factors

			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROL				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0.05	0.99	0.750	18.000	**3.285**	0.008	**0.033**	0.0004	0	0
PM10	0.0125	0.99	0.188	4.500	**0.821**	0.002	**0.008**	0.0001	0.10	0.43
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

0.005 gr/acfm

Manufacturer's specifications

326 IAC 6-1-2 (h)

93-35 **Dextrin Filter Receiver**

MDR (T/hr): 4.5 | YEARLY PROD (T/yr): N/A | STACK ID (DIAM:HEIGHT): (1': 77.5') | FLOWRATE (ACFM): 2400 | Ts(°F): 90

CNTRL DEV: Bag Filter Dust Collector

PERMITTED OPERATING HRS: **8760** hr/yr

Starch Filtering - SCC # 3-02-014-06

AP-42 Factors

			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROL				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0.05	0.99	0.225	5.400	**0.986**	0.002	**0.010**	0.0001	0	0
PM10	0.0125	0.99	0.056	1.350	**0.246**	0.001	**0.002**	0.0000	0.10	0.43
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

0.005 gr/acfm
Manufacturer's specifications
326 IAC 6-1-2 (h)

93-37 **Channel 1/4 (Dextrin) Packaging Dust Collector**

MDR (T/hr): 45 | YEARLY PROD (T/yr): N/A | STACK ID (DIAM:HEIGHT): (2': 10') | FLOWRATE (ACFM): 12000 | Ts(°F): 70

CNTRL DEV: Bag Filter Dust Collector

PERMITTED OPERATING HRS: **8760** hr/yr

Starch Bulk Loadout - SCC # 3-02-014-08

AP-42 Factors

			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROL				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0.0275	0.99	1.238	29.700	**5.420**	0.012	**0.054**	0.0001	0	0
PM10	0.0075	0.99	0.338	8.100	**1.478**	0.003	**0.015**	0.0000	0.51	2.25
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

Emission factors obtained from the AP-42, Section 9.9.1 Grain Elevators and Processes (Product Loadout).
(PM) EF = 0.011 lb/ton * 2.5 = 0.0275 lb/ton (PM10) EF = 0.003 lb/ton * 2.5 = 0.0075 lb/ton
Emission Factor is multiplied by the Dustiness Ratio (DR), DR for corn = 2.5

0.005 gr/acfm
Manufacturer's specifications
326 IAC 6-1-2 (h)

Appendix A
(continued)

Starch Warehouse Channelization Project
Replaced Emissions Units (5)

The following five (5) units will be removed and
will be replaced by the previous six (6) new units

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93-01 thru 93-03 **Cornstarch Conveying #46 and #47 Dextrin Conveying #48**

MDR (T/hr): 90
YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1': 45')
FLOWRATE (ACFM): 8000
Ts(°F): 90

CNTRL DEV: Dust Collector

PERMITTED OPERATING HRS: **8760** hr/yr

Starch Filtering - SCC # 3-02-014-06
AP-42 Factors

			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROL				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0.0275	0.99	2.475	59.400	**10.841**	0.025	**0.108**	0.0004	1.62	7.10
PM10	0.0075	0.99	0.675	16.200	**2.957**	0.007	**0.030**	0.0001	1.62	7.10
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

Emission factors obtained from the AP-42, Section 9.9.1 Grain Elevators and Processes (Product Loadout). 0.54 each
(PM) EF = 0.011 lb/ton * 2.5 = 0.0275 lb/ton (PM10) EF = 0.003 lb/ton * 2.5 = 0.0075 lb/ton 326 IAC 6-1-10.1 (d)
Emission Factor is multiplied by the Dustiness Ratio (DR), DR for corn = 2.5

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93-06 and 93-07 **Starch Packing Systems #43 and # 44**

MDR (T/hr): 60
YEARLY PROD (T/yr): N/A

STACK ID (DIAM:HEIGHT): (1': 45')
FLOWRATE (ACFM): 2800
Ts(°F): 90

CNTRL DEV: Bag Filter Dust Collector

PERMITTED OPERATING HRS: **8760** hr/yr

Starch Filtering - SCC # 3-02-014-06
AP-42 Factors

			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROL				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0.0275	0.99	1.650	39.600	**7.227**	0.017	**0.072**	0.0007	0.24	1.05
PM10	0.0075	0.99	0.450	10.800	**1.971**	0.005	**0.020**	0.0002	0.24	1.05
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

326 IAC 6-1-10.1 (d)

Totals: Starch Warehouse Channelization Project — New Emissions Units (6)

Starch Movement

receiving filters, storage bins, and loadouts (packaging).

SCC # 3-02-014-06

SCC # 3-02-014-07 PERMITTED OPERATING HRS: **8760** hr/yr

SCC # 3-02-014-08

		POTENTIAL EMISSIONS					
		BEFORE CONTROLS			AFTER CONTROL		
POLLUTANT	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)
PM	0.99	5.31	127.50	**23.27**	0.05	**0.23**	N/A
PM10	0.99	1.38	33.15	**6.05**	0.01	**0.06**	N/A
SOx	0	0	0	0	0	0	N/A
NOx	0	0	0	0	0	0	N/A
VOC	0	0	0	0	0	0	N/A
CO	0	0	0	0	0	0	N/A
LEAD	0	0	0	0	0	0	N/A

Totals: Starch Warehouse Channelization Project — Replaced Emissions Units (5)

Starch Movement

receiving filters, storage bins, and loadouts (packaging).

SCC # 3-02-014-06

SCC # 3-02-014-07 PERMITTED OPERATING HRS: **8760** hr/yr

SCC # 3-02-014-08

		POTENTIAL EMISSIONS					
		BEFORE CONTROLS			AFTER CONTROL		
POLLUTANT	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)
PM	0.99	4.13	99.00	**18.07**	0.04	**0.18**	N/A
PM10	0.99	1.13	27.00	**4.93**	0.01	**0.05**	N/A
SOx	0	0	0	0	0	0	N/A
NOx	0	0	0	0	0	0	N/A
VOC	0	0	0	0	0	0	N/A
CO	0	0	0	0	0	0	N/A
LEAD	0	0	0	0	0	0	N/A

Total increase in potential emissions before and after controls due to the Starch Warehouse Channelization Project

(modification)

		POTENTIAL EMISSIONS				
		BEFORE CONTROLS			AFTER CONTROLS	
POLLUTANT	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)
PM	0.99	1.19	28.50	**5.20**	0.012	**0.052**
PM10	0.99	0.26	6.15	**1.12**	0.003	**0.011**